



**California
Water
Environment
Association**

7677 Oakport Street, Suite 500
Oakland, CA 94621

DUPLICATE
NOT AN OFFICIAL RECORD

March 18, 2010

Mayor Gavin Newsom
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: The Center for Food Safety/Resource Institute for Low Entropy Systems Petition

Dear Mayor Newsom:

On behalf of the California Water Environment Association (CWEA), I am writing to express our strong support for the continuation of the biosolids compost giveaway program administered by the San Francisco Public Utilities Commission (SFPUC) since 2007.

CWEA is a statewide non-profit public benefit association of about 9,000 individual members in the wastewater profession who are committed to keeping California's water clean. CWEA protects our water environment and the public's health by training and certifying water environment professionals, disseminating technical information, and promoting sound policies to benefit society. CWEA is dedicated to the educational development of our members, who range from field level to management level. Most of CWEA's members (approximately 80 percent) work for municipal wastewater agencies and collection systems, both large and small, throughout the state of California.

CWEA is aware of the petition filed in September 2009 by the Center for Food Safety (CFS) and the Research Institute for Low Entropy Systems (RILES) seeking an end to the SFPUC biosolids compost giveaway program. The Organic Consumers Association recently added its support of this petition. CWEA respectfully recommends that the CFS/RILES petition should be denied for the following reasons:

- The beneficial reuse of properly managed biosolids through land application to farms, reclamation of disturbed lands, as fertilizer for raising feed crops, soil enhancement, and composting is a safe and time-tested recycling practice when federal, state and local regulations are strictly followed;
- CWEA understands that the SFPUC's biosolids and biosolids compost program comport with federal, state and local regulations, including the U.S. Environmental Protection Agency (EPA), California's Integrated Waste Management Act, the latter of which requires localities to reduce, through reuse and recycling programs, the amount of solid waste, including biosolids, going to landfills;
- The safety of beneficial use of properly managed biosolids has been underscored by decades of scientific work, including two National Academy of Science reviews,

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- Petitioners' allegations that biosolids pose a threat to human health and the environment are not supported based on existing scientific information;
- Biosolids recycling is a successful component of America's clean water program; and,
- The U.S. EPA has met and continues to meet its obligations to update the science underpinning its regulations of biosolids management practices under Part 503 Rule of its clean water program.

CWEA is very pleased that your administration has held firm in its support for the program and health and for environmental policies that are based on sound science. San Francisco has proactively embraced its environmental stewardship by recognizing and maximizing this renewable resource. Wastewater agencies throughout the state are being recognized as sustainable resource recovery centers through the production and use of recycled water for the liquid stream and responsible treatment and beneficial use of biosolids for the solids stream.

We appreciate your recognition of the benefits of SFPUC's biosolids compost and its giveaway program and encourage you to remain steadfast in its support. In this, San Francisco has once again shown itself to be a true environmental leader.

Sincerely,



Darren Greenwood
CWEA President

cc: CWEA Board of Directors
Ed Harrington, General Manager, SFPUC
Mike Housh, Secretary to SFPUC Commissioners, SFPUC
Tommy T. Moala, Assistant General Manager, Wastewater Enterprise, SFPUC